

From: [Ashley Walter](#)
To: [Daniel Crowell](#); [Heather Collins](#)
Cc: [Anne Hunter](#); [Erica Runnels](#); [Leslie Sanders](#)
Subject: RE: Discovery Conference
Date: Thursday, May 27, 2021 1:44:19 PM
Attachments: [image001.png](#)
[image002.png](#)

Great, talk to you then.

Ashley Walter

7000 Executive Center Drive, Suite 320
Brentwood, Tennessee 37027
615.724.1996 · 615.691.7019 fax
www.collinshunter.com

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From: Daniel Crowell <dcrowell@webbsanderslaw.com>
Sent: Thursday, May 27, 2021 1:39 PM
To: Ashley Walter <ashley@collinshunter.com>; Heather Collins <heather@collinshunter.com>
Cc: Anne Hunter <anne@collinshunter.com>; Erica Runnels <erica@collinshunter.com>; Leslie Sanders <lsanders@webbsanderslaw.com>
Subject: Re: Discovery Conference

Thanks, I'll call you at 4:00.

Daniel Crowell
Webb Sanders PLLC
Direct: 615.241.9838
Cell: 859.608.4296
dcrowell@webbsanderslaw.com

From: Ashley Walter <ashley@collinshunter.com>
Sent: Thursday, May 27, 2021 1:35:49 PM
To: Daniel Crowell <dcrowell@webbsanderslaw.com>; Heather Collins <heather@collinshunter.com>
Cc: Anne Hunter <anne@collinshunter.com>; Erica Runnels <erica@collinshunter.com>; Leslie Sanders <lsanders@webbsanderslaw.com>
Subject: RE: Discovery Conference

Hi Daniel,

I will not be in the office tomorrow, but I am available after 3:30pm today. You can reach me at the office number below.

Ashley

Ashley Walter

7000 Executive Center Drive, Suite 320
Brentwood, Tennessee 37027
615.724.1996 · 615.691.7019 fax
www.collinshunter.com

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From: Daniel Crowell <dcrowell@webbsanderslaw.com>
Sent: Thursday, May 27, 2021 11:32 AM
To: Ashley Walter <ashley@collinshunter.com>; Heather Collins <heather@collinshunter.com>
Cc: Anne Hunter <anne@collinshunter.com>; Erica Runnels <erica@collinshunter.com>; Leslie Sanders <lsanders@webbsanderslaw.com>
Subject: RE: Discovery Conference

Any time after 2:00PM today works for me. I can also make any time work tomorrow.

From: Ashley Walter <ashley@collinshunter.com>
Sent: Tuesday, May 25, 2021 4:59 PM
To: Daniel Crowell <dcrowell@webbsanderslaw.com>; Heather Collins <heather@collinshunter.com>
Cc: Anne Hunter <anne@collinshunter.com>; Erica Runnels <erica@collinshunter.com>; Leslie Sanders <lsanders@webbsanderslaw.com>
Subject: RE: Discovery Conference

Daniel,

Without waiving any privilege which may apply, but more for the sake of judicial economy, please see the attached supplemental production. With this production there are no additional documents being withheld due to privilege, as such a privilege log is no longer necessary. As you will see, this production contains copies text messages between Kushkin and O'Connor. It is our understanding this is all there is. This should render the subpoena to Kushkin unnecessary.

However, we will represent him for purposes of discovery in this case to the extent you still feel the

need to pursue documents from him. If that is the case, I am available Thursday afternoon to have the required meet and confer.

☐ [05252021 187-380](tel:05252021187380)

Best,
Ashley



Collins & Hunter
— PLLC —

Ashley Walter

7000 Executive Center Drive, Suite 320
Brentwood, Tennessee 37027
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www.collinshunter.com

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From: Daniel Crowell <dcrowell@webbsanderslaw.com>

Sent: Monday, May 24, 2021 12:34 PM

To: Heather Collins <heather@collinshunter.com>

Cc: Anne Hunter <anne@collinshunter.com>; Erica Runnels <erica@collinshunter.com>; Ashley Walter <ashley@collinshunter.com>; Leslie Sanders <lsanders@webbsanderslaw.com>

Subject: Discovery Conference

Heather,

Please let me know your availability for a call to discuss the following:

1. Rob Kuskin – we still don't know whether you are representing him, whether you can & will accept service of the subpoena on his behalf, or his current address. As you know, I sent a subpoena to Mr. Kuskin last Wednesday at the only address that I was able to locate, but I have no way of knowing whether that service will be effective because I can't confirm his address. In Interrogatory No. 1 of Defendant's First Set of Interrogatories, we asked for Mr. Kuskin's physical address, mailing address, telephone number, and email address. Plaintiff's answer to Interrogatory No. 1 stated that Mr. Kuskin could only be contacted through you. If

you can't or won't accept service of the subpoena for Mr. Kuskin, then we need all of that contact information.

2. Privilege Log – we still don't have a privilege log for Plaintiff for anything that you have withheld based on attorney-client, work product, spousal, or any other privileges.

I would like to have the call this week to ensure that we can get all of this resolved before Plaintiff's deposition.

Regards,

Daniel Crowell
Webb Sanders PLLC
CitySpace | 611 Commerce Street | Suite 3102 | Nashville, TN 37203
Direct: 615.241.9838 | Main: 615.915.3300 | Cell: 859.608.4296 | Fax: 866.277.5494
dcrowell@webbsanderslaw.com



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From: [Daniel Crowell](#)
To: [Heather Collins](#)
Cc: [Anne Hunter](#); [Ashley Walter](#); [Erica Runnels](#); "[lsanders@webbsanderslaw.com](#)"
Subject: FW: Ramsey/O'Connor
Date: Wednesday, May 19, 2021 5:02:00 PM
Attachments: [2021.05.19 Subpoena - Kuskin, Rob.pdf](#)

Heather,

I am sending the attached subpoena via UPS to you and to Rob Kuskin directly at the only address that I was able to locate for him, 1222 Country Road, Franklin, TN 37069.

If you represent Mr. Kuskin and will accept service for him, then please tell him to disregard the copy of the subpoena sent directly to him.

If you do not represent Mr. Kuskin or will not accept service for him, then please confirm whether I have his correct address.

Regards,

Daniel

From: Daniel Crowell
Sent: Friday, May 14, 2021 5:28 PM
To: Heather Collins <heather@collinshunter.com>
Cc: Anne Hunter <anne@collinshunter.com>; Erica Runnels <erica@collinshunter.com>; Ashley Walter <ashley@collinshunter.com>; Leslie Sanders <lsanders@webbsanderslaw.com>
Subject: RE: Ramsey/O'Connor

OK, that's fine, but I will still be serving it on Wednesday. Please let me know if you still represent Mr. Kuskin and, if so, whether I should send the subpoena to you or serve him directly. And, if directly, please send me his address.

From: Heather Collins <heather@collinshunter.com>
Sent: Friday, May 14, 2021 5:20 PM
To: Daniel Crowell <dcrowell@webbsanderslaw.com>
Cc: Anne Hunter <anne@collinshunter.com>; Erica Runnels <erica@collinshunter.com>; Ashley Walter <ashley@collinshunter.com>; Leslie Sanders <lsanders@webbsanderslaw.com>
Subject: RE: Ramsey/O'Connor

We object to it on Wednesday too.

From: Daniel Crowell <dcrowell@webbsanderslaw.com>
Sent: Friday, May 14, 2021 5:10 PM
To: Heather Collins <heather@collinshunter.com>
Cc: Anne Hunter <anne@collinshunter.com>; Erica Runnels <erica@collinshunter.com>; Ashley

Walter <ashley@collinshunter.com>; Leslie Sanders <lsanders@webbsanderslaw.com>

Subject: RE: Ramsey/O'Connor

You're right. I'll serve it on Wednesday. Please let me know if you want me to send it to you or serve directly and, if directly, please send me his address.

From: Heather Collins <heather@collinshunter.com>

Sent: Friday, May 14, 2021 5:04 PM

To: Daniel Crowell <dcrowell@webbsanderslaw.com>

Cc: Anne Hunter <anne@collinshunter.com>; Erica Runnels <erica@collinshunter.com>; Ashley Walter <ashley@collinshunter.com>; Leslie Sanders <lsanders@webbsanderslaw.com>

Subject: RE: Ramsey/O'Connor

Daniel,

The Local Rules require 2 business days to pass prior to service of the subpoena. Monday is not 2 business days, particularly given that is nearly the end of the business day today. We object to the subpoena.

From: Daniel Crowell <dcrowell@webbsanderslaw.com>

Sent: Friday, May 14, 2021 4:30 PM

To: Heather Collins <heather@collinshunter.com>

Cc: Anne Hunter <anne@collinshunter.com>; Erica Runnels <erica@collinshunter.com>; Ashley Walter <ashley@collinshunter.com>; Leslie Sanders <lsanders@webbsanderslaw.com>

Subject: Ramsey/O'Connor

Heather,

We plan to serve the attached subpoena on Monday. In plaintiff's interrogatory answers, you indicated that Rob Kuskin should be contacted through you. Please let me know if you are still representing him and, if so, whether I should send the subpoena to you or serve him directly. If directly, please provide me with his current address.

Relatedly, please provide me with an ETA for plaintiff's privilege log for any documents that have been withheld based on attorney-client, work product, spousal, or any other privileges.

Regards,

Daniel Crowell

Webb Sanders PLLC

CitySpace | 611 Commerce Street | Suite 3102 | Nashville, TN 37203

Direct: 615.241.9838 | Main: 615.915.3300 | Cell: 859.608.4296 | Fax: 866.277.5494

dcrowell@webbsanderslaw.com



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